

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

ABHINAV BHATNAGAR, ) Case No.: Case No. CV07-02669 (CRB)  
Plaintiff, )  
vs. )  
JASON INGRASSIA, individually and in )  
his official capacity; COUNTY OF )  
CONTRA COSTA; and CITY OF )  
SAN RAMON. )  
Defendants. )  
PROPOSED PROTECTIVE ORDER

This matter is before the court upon Plaintiff's Motion for a Protective Order to prevent Defendant Jason Ingrassia from attending the deposition of Richard Ha. Based upon the documents submitted on this motion, including the affidavits of Richard Ha, Plaintiff Abhinav Bhatnagar, Deputy Public Defender Diana Garrido, Deputy Public Defender Timothy Ahearn, and Plaintiff's counsel, Jenny Huang, and all the documents contained in the record herein, the Court makes the following protective order pursuant to Fed. R. Civ. Pro., Rule 26(c):

- (1) Defendant JASON INGRASSIA shall be excluded from the deposition room, outside hallways or common areas adjoining the deposition room, or any other place where RICHARD HA is present during his deposition. This order shall also apply during any breaks throughout the day of Mr. HA'S deposition.

## **IT IS SO ORDERED.**

Dated: December \_\_\_\_ , 2007

The Honorable Charles R. Breyer  
United States District Judge